

1 Honorable Mary Jo Heston
2 Chapter 7
3 Location: Tacoma

4
5 UNITED STATES BANKRUPTCY COURT
6 WESTERN DISTRICT OF WASHINGTON

7 In re

No. 19-41238

8 DIANE ERDMANN,

EX PARTE APPLICATION FOR
EMPLOYMENT OF COUNSEL FOR
TRUSTEE

9
10 COMES NOW Kathryn A. Ellis, the duly appointed Chapter 7 Trustee for the above-
11 captioned bankruptcy estate (“Trustee”), and for her *Ex Parte* Application for Appointment of
12 Counsel for Trustee, states as follows:

13 1. The Trustee believes that her interests and the estate’s interests can best be
14 represented by retaining legal counsel. Specifically, legal counsel will be of assistance regarding
15 the investigation and litigation of avoidance claims and the debtor’s interest in assets held by
16 Mark Calvert, Trustee of the bankruptcy estate of Northwest Territorial Mint LLC (Bk. No. 16-
17 11767). Given the fact that there are no funds in the estate currently to pay counsel, outside
18 counsel does not appear feasible. Further, given my knowledge of the essential facts in this case,
19 it would appear economical.

20 2. The Trustee wishes to retain herself as counsel in this proceeding, at the regular
21 hourly rate of \$425.00 per hour. No retainer has been promised or provided.

22 3. Based upon of the Declaration of Disinterest submitted herewith, the Trustee is
23 aware of no connections between herself and the debtor, creditors, any party in interest, their
24 respective attorneys and accountants, the United States Trustee, or any person employed in the
25
26

27
28 KATHRYN A. ELLIS PLLC
5506 6th Ave S
Suite 207
Seattle, WA 98108
(206) 682-5002

**EX PARTE APPLICATION FOR
APPOINTMENT OF COUNSEL FOR TRUSTEE - 1**

1 office of the United States Trustee other than as set forth above.

2 WHEREFORE, the Trustee requests that the Court enter an *ex parte* order authorizing
3 Kathryn A. Ellis to represent the Trustee and her interests in any and all legal matters that may
4 arise during the administration of this case.
5

6 No notice to creditors of this application is necessary pursuant to 11 U.S.C. § 102 (1) and
7 FRBP 2002.

8 WHEREFORE, the Trustee prays for an order accordingly.
9

DATED this 16th day of July, 2019.

11 /s/ Kathryn A. Ellis
12 Kathryn A. Ellis, Trustee

13 The undersigned declares under the penalty of perjury that he provided the Office of the
14 United States Trustee with a copy of this Application, Declaration of Disinterest and
15 proposed order pursuant to LBR 2014-1 (b) and has received authorization from the
16 Office of the United States Trustee to file the same.

DATED this 17th day of July, 2019 at Seattle, Washington.

17 /s/ Christopher Williams
18 Christopher Williams
19 Assistant to Kathryn A. Ellis
C:\Shared\OneDrive - Kathryn A Ellis\Shared\341\2019\072919\Erdmann\ellis_app.wpd

20
21
22
23
24
25
26
27 KATHRYN A. ELLIS PLLC
28 5506 6th Ave S
Suite 207
Seattle, WA 98108
(206) 682-5002

**EX PARTE APPLICATION FOR
APPOINTMENT OF COUNSEL FOR TRUSTEE - 2**